

# EXHIBIT A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

INDEPENDENT ASSET MANAGEMENT	)	Case No. 1:07-cv-06431-JSR
LLC,	)	
	)	ECF
Plaintiff,	)	
	)	
vs.	)	
	)	
DANIEL ZANGER,	)	
	)	
Defendant.	)	
	)	
	)	
	)	
	)	

---

**ZANGER'S FIRST INTERROGATORIES TO IAM**

Defendant Daniel Zanger (“Zanger”), by his attorneys, Jones Day, hereby serves, pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, and Rule 33.3 of the Local Civil Rules of the United States District Court for the Southern District of New York, upon Independent Asset Management, LLC (“IAM”) the following interrogatories, which must be answered separately and fully in writing, under oath before a notary public, and served upon the undersigned attorneys, no later than February 7, 2008.

**DEFINITIONS**

In addition to the definitions contained in Rule 26.3 of the Local Civil Rules, the following definitions and instructions shall apply to each of the Interrogatories:

- A. “Communications” shall include without limitation emails, letter correspondence, instant messages, etc.

- B. "Zanger" shall refer to Defendant and Counter-Claim Plaintiff Daniel Zanger.
- C. "IFL" shall refer to The Independent Fund Limited.
- D. "IAM" shall refer to Plaintiff Independent Asset Management, LLC, and all of its officers, directors, and General or Limited Partners.
- E. "Agreement" refers to the October 19, 2004 Agreement between IAM and Zanger.
- F. "Prime Broker" shall refer to Goldman Sachs Execution and Clearing, L.P, its parent Goldman Sachs, and all affiliated divisions and sub-entities.
- G. "Fund Administrator" shall refer to Butterfield Fund Services (Bermuda) Limited.
- H. "Szele" refers to George Szele, Managing Director of Independent Asset Management, LLC.
- I. "Porco" refers to Joseph Porco, Managing Director of Independent Asset Management, LLC.
- J. "Holmstrom" shall refer to investor in IFL, and former Plaintiff, Ola Holmstrom.
- K. "Class Z" shall refer to the Class Z shares of the Independent Fund Limited.
- L. "NAV" refers to Net Asset Value.
- M. "Interactive" refers to Interactive Brokerage.
- N. "BMA" refers to Bermuda Monetary Authority.
- O. "Sea Carriers" refers to Sea Carriers Limited Partnership I.

P. "Deloitte" refers to Deloitte and Touche LLP.

Q. "Victory Lane" refers to Victory Lane Inc., the holding company of which Zanger was president.

**INSTRUCTIONS**

A. Whenever a request calls for information which is not available to you in the form requested, but is available in another form or can be obtained, at least in part, from other data in your possession, so state and either supply the information requested in the form in which it is available or supply the data from which the information requested can be obtained.

B. The time frame for these Interrogatories, unless otherwise indicated or agreed by the parties, is January 1, 2001 to the present.

**INTERROGATORIES**

1. Identify all Persons having knowledge concerning the matters set forth below and describe generally the substance of the knowledge possessed by each such person:

(a) the matters set forth in the Amended Complaint;

(b) the averments in Zanger's Answer;

(c) the topics addressed in Zanger's First Request for Production of Documents to IAM, dated January 3, 2008.

2. Provide the computation of each category of damages alleged.

2. Identify all Documents or physical evidence relevant to (a) the subject matter of the Complaint or (b) the averments in Zanger's Answer, including information sufficient to identify the custodian, location and general description of all such Documents or physical evidence.

Dated: New York, New York  
January 3, 2008

Respectfully submitted,

*s/ Matthew E. Szwajkowski*  
\_\_\_\_\_  
Thomas H. Sear (TS-5570)  
Matthew E. Szwajkowski (MS-8362)  
JONES DAY  
222 East 41st Street  
New York, NY 10017-6702  
Telephone: (212) 326-3939  
Facsimile: (212) 755-7306  
mszwajkowski@jonesday.com

*Attorneys for Daniel Zanger*

**CERTIFICATE OF SERVICE**

The foregoing document was served on the following counsel of record on January 3, 2008 via the method listed below:

**E-Mail and UPS**

John Balestiere  
Craig Stuart Lanza  
Balestiere PLLC  
225 Broadway, Suite 2700  
New York, NY 10007  
[clanza@balestiere.net](mailto:clanza@balestiere.net)

*s/ Matthew E. Szwajkowski*  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_